

BEFORE THE
Federal Communications Commission
WASHINGTON, D. C. 20554

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In the Matter of

Amendment of Section 2.106 of
the Commission's Rules to
Allocate Spectrum at 2 GHz for
Use by the Mobile-Satellite
Service

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

ET Docket No. 95-18

To: The Commission

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REPLY COMMENTS OF
LOS ANGELES COUNTY SHERIFF'S DEPARTMENT
AND COUNTY OF LOS ANGELES INTERNAL SERVICES DEPARTMENT
IN RESPONSE TO
SUPPLEMENTAL COMMENTS OF COMSAT CORPORATION

The Los Angeles County Sheriff's Department and the County of Los Angeles Internal Services Department (the "County") hereby submits the following comments in response to the Supplemental Comments of COMSAT Corporation ("COMSAT") filed on March 14, 1996, in the above-captioned proceeding.

The County of Los Angeles is the licensee of a 2 GHz microwave communications network that provides the backbone for the County's public safety mobile communications systems. The network includes frequencies in the 2100-2200 MHz bands proposed for reallocation to Mobile Satellite Services ("MSS"). The Los Angeles County Sheriff's Department is the principal user of the County's microwave network, which links its radio transmitter sites, stations and substations located throughout the County. The system

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carries all of the Sheriff's voice and mobile data dispatch communications. The microwave network is also a critical element of the communications systems used by the Los Angeles County Fire Department and other public safety agencies in the County. Therefore, the County's microwave system is absolutely essential to the safety of the over nine million people who reside in and travel through its borders on a daily basis.

The County has long opposed the reallocation of 2 GHz microwave frequencies and any requirement that public safety incumbents relocate to other bands. Any forced relocation that does take place must be fully reimbursed by the new users of the band, pursuant to the negotiation process adopted in ET Docket 92-9. Under no circumstances should a public safety license such as the County (and, therefore, taxpayers) be required to pay any of the direct or indirect costs of relocating its 2 GHz paths to accommodate MSS. Therefore, the County strongly opposes COMSAT's proposal that all fixed microwave incumbents simply vacate the 2130-2150/2180-2200 MHz bands by the year 2005.^{1/}

In addition to the expense imposed on taxpayers, forcing incumbents off of the band could deprive public safety operations of critical communications capability, as replacement frequencies may soon be unavailable in some

^{1/} To the extent that any 2100-2200 MHz paths are cleared as a result of PCS-driven relocation agreements of 2 GHz systems, the PCS licensees who paid for the relocation should be permitted to seek cost-sharing reimbursement from any MSS licensees who benefit in the future from such relocation.

markets. Potential replacement bands, such as 6 GHz, are becoming heavily congested as many 1850-1990 MHz licenses are being relocated to that band as part of relocation agreements with PCS licensees. Under COMSAT's proposal, all incumbent microwave licensees would have to vacate the band by 2005 at their own expense, even if no replacement frequencies are available. That would be a disaster for public safety incumbents and the citizens that they protect on a daily basis.

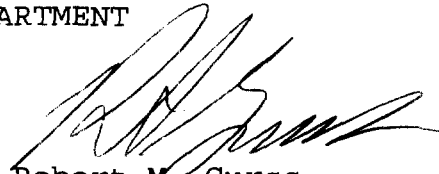
CONCLUSION

For the reasons discussed above, the Commission should reject COMSAT's proposals set forth in its Supplemental Comments.

Respectfully submitted,

LOS ANGELES COUNTY SHERIFF'S
DEPARTMENT AND THE COUNTY OF LOS
ANGELES, INTERNAL SERVICES
DEPARTMENT

By:



Robert M. Gurss
WILKES, ARTIS, HEDRICK & LANE,
Chartered
1666 K Street, N.W. #1100
Washington, D.C. 20006
(202) 457-7329

Its Attorneys

May 17, 1996

CERTIFICATE OF SERVICE

I, Jane Nauman, hereby certify that a copy of the foregoing "Reply Comments of Los Angeles County Sheriff's Department and County of Los Angeles Internal Services Department in Response to Supplemental Comments of COMSAT Corporation" was served this 17th day of May, 1996, by first-class mail, postage prepaid, to the following individual at the address listed below:

Nancy J. Thompson, Esq.
COMSAT International Communications
6560 Rock Spring Drive
Bethesda, MD 20817


Jane Nauman